

To: Geoff Westphal[Geoff.Westphal@greif.com]
Cc: Patel, Manojkumar[patel.manojkumar@epa.gov];
 Scott.Mounts@greif.com[Scott.Mounts@greif.com]
Bcc: Olson, Erik[olson.erik@epa.gov]
From: Letuchy, Alexandra
Sent: Mon 7/31/2017 2:57:33 PM
Subject: CLCM (St. Francis) stack testing

Geoff,

Thank you for taking the time to discuss the emission testing protocol operating parameters with us last week. As we discussed, CLCM will resubmit the testing protocol or will submit an attachment to the protocol by August 4th, detailing the following:

- a. The proposed production rate during the test in drums/hour for both the steel and poly lines. Provide an explanation of how the proposed production rate would produce the most VOC emissions from the emission units. In my experience, facilities usually review past operations to determine the max drums/hour previously processed and then set that as their proposed production rate. Include any such analysis in the protocol.
 - b. The proposed process operating conditions during the test. Based on our discussions today, CLCM is proposed to run all chemical drums on both the steel line and the poly line. Provide an explanation of how the proposed operating conditions would produce the most VOC emissions from the emission units. Also, include discussion of all other emissions units that will be operating during the test.
 - c. An explanation of how water testing results may be used to develop a response factor for VOC emission rates measured with Method 25A. Include reference to EPA test methods detailing this procedure.
 - d. In addition to the items listed in 20.g.ii., EPA asked that CLCM record and report the following for the duration of the test:
 1. The vendor name and chemical name for each drum washed during each run; and
 2. Drums/hour processed during each run (this would fulfill the requirement to report line speed).
- Please note in the protocol all items that will be recorded during the test and reported in the final report.
- e. EPA also asked that CLCM make available the RCRA empty container certification for

each drum during the test. EPA is not requesting that copies of these certifications be included in the stack test report.

Please let me know if you have any questions,

Alexandra (Sasha) Letuchy

Environmental Engineer

Air Enforcement Compliance Assurance Branch MI/WI Section

US EPA Region 5

letuchy.alexandra@epa.gov

312.886.6035